

Conflict of Interest and Related-Party Transactions Policy

a. Purpose

The purpose of the Conflict of Interest and Related-Party Transactions Policy is to:

- Ensure that deliberations and decisions are made in the best interests of the Company;
- Protect the interests of the Company when it is entering into a transaction, contract or arrangement that might benefit the private interest of a related interested employee; and
- Limit the scope of conflicts of interest by sensitising employees on their possible existence at the workplace and how these can be avoided or managed.

b. Scope of Application

This Policy applies to all current and prospective employees, as well as persons acting on behalf of the Company. The Company includes Constance Hotels Services Ltd, Constance Hospitality Management Ltd, Constance Hospitality Training Centre Ltd, and all entities managed by Constance Hospitality Management Ltd, under any brand names.

c. Structure and Content

The Conflict of Interest and Related-Party Transactions Policy is structured in 5 distinct sections as follows:

Section	Sub-Section	Description
1. Conflicts of Interest at the Workplace	N.A	<ul style="list-style-type: none"> Definition of Conflict of Interest.
2. Ways to Avoid/Manage Conflicts of Interest	Gifts, Gratuities or Favours	<ul style="list-style-type: none"> Prohibition on the acceptance of gifts, gratuities or favours from any person or organisation that share any kind of business relationship with the Company.
	Outside Activities and Commitments	<ul style="list-style-type: none"> Team Members to seek approval from his/her Head of Department and the Human Resources Managers prior to undertaking an outside commitment or economic activity.
	Close Personal Relationships	<ul style="list-style-type: none"> Measures to be taken so that a close relationship with other employees does not give rise to unfair advantages or preferential treatment and does not cause others to lose confidence in the judgement or objectivity of the person.
	Insider Dealing	<ul style="list-style-type: none"> Prohibition for Team Members to act upon insider Company information for financial gain/benefit of self or of a connected person. Prohibition for Team Members to use confidential or privileged information gained in the course of employment at the Company for financial gain/benefit of self or of a connected person.
	Corporate Opportunities	<ul style="list-style-type: none"> Prohibition for Team members to take advantage of corporate opportunities for themselves or for their connected persons.
	Procurement and Contracting	<ul style="list-style-type: none"> Company interests should be put first in all procurement and contracting decisions.
	Influence Peddling	<ul style="list-style-type: none"> Employees should not use their position or relationship within the Company to give unduly favourable treatment to a particular stakeholder.
	Trading with the Company	<ul style="list-style-type: none"> Prior to engaging in any trade with the Company, a Team Member should inform his/her Head of Department and the HR manager and obtain the necessary approvals.
Use of Company Time & Assets	<ul style="list-style-type: none"> Team Members should not use and permit the use of the Company assets for activities not related to the Company. 	
Recording or Reporting False Information	<ul style="list-style-type: none"> Employees should not distort, withhold or falsify information that is meant for decision-making, in order to derive personal benefits. 	
3. Related-Party Transactions	N.A	<ul style="list-style-type: none"> Related-party transactions should be at arm's length and adequately addressed through proper monitoring, approval and disclosure.
4. Disclosure and Monitoring	N.A	<ul style="list-style-type: none"> Disclosure and monitoring procedures of conflicts of interest.
5. Non-Compliance	N.A	<ul style="list-style-type: none"> Non compliance with this Policy shall be appropriately addressed and may lead to disciplinary actions